

TRI Tax Resolution Institute

...where your tax debt is your power!

“Busy Season”
...all year long

www.taxresolutioninstitute.org

info@taxresolutioninstitute.org

(877) 829-8370

Low Hanging Fruit

How to make "real" money in the next 12 months

Meet our speaker



Peter Y. Stephan, CPA

(800) 658-7590

www.taxresolutioninstitute.org

Why are we here today?

The Tax Resolution Institute prides itself in assisting accounting, legal and other professionals resolve their client's tax problems and grow their businesses

Take advantage of one of our many programs

- **We help you make more money**
- We teach you how to become a tax resolution specialist
- We become your partner working side-by-side to help you solve your client's IRS and State income, payroll (collection issues) and tax audit issues
- Or...we become your trusted referral source

Have you downloaded your materials?

Visit www.taxresolutioninstitute.org/100A to get
your free content for the next 10 days

If you currently have a client or clients with tax resolution issues
and need assistance right away

call our office at

(800) 658-7590

or

email us at

info@taxresolutioninstitute.org

(800) 658-7590

www.taxresolutioninstitute.org

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Polling Question 1

Do you currently practice tax resolution?

Income Taxes

Solving Income Tax Issues

5 most common methods:

- Installment agreement
- Currently Not Collectible (“CNC”) Status
- Partial-pay installment agreement (“PPIA”)
- Offer in compromise (“OIC”)
- Discharging taxes in bankruptcy

Low Hanging Fruit #1

Streamlined Installment Agreements

Earn \$1,000 - \$2,500 each

IRS Streamlined Installment Agreements

Your expertise should dictate the fees you charge, not the time you spend...

- A streamlined installment agreement requires more than just making a call...

IRS Streamlined Installment Agreements

Things to consider...

- Does the client owe \$25,000 or less?
- Does the client owe \$50,000 or less?
- Did you advise the client to pay down their liability if they owe more?
- Is the client in current compliance?
- Have recent tax filings posted?

IRS Streamlined Installment Agreements

Preparation...

- Do you have your client's bank information (account and routing number)?
- Did you predetermine a day of the month to debit your client's account?
- Have you completed IRS form 9465?
- Have you completed form 433D?

IRS Streamlined Installment Agreements

Complete the task in one call...

- Do your homework before you make the call...pull transcripts to verify information
- Make sure you have time to wait on hold
- Have all forms completed prior to the call
- Get client signatures as necessary

IRS Streamlined Installment Agreements

Summary

- Streamlined installment agreements seem simple but if you are not prepared, you can easily spend extra time completing the task.
- If you are prepared and get things done efficiently, you should be compensated for your knowledge

Polling Question 2

Have you ever submitted a streamlined installment agreement?

Become a TRI subscriber

What to do...
when things get tough

20% off
Annual subscriptions

This program shows you how to fix the problem
when most think they're done!

...don't get left behind

Tax Resolution Institute

Annual Subscription

Platinum Package 

\$90/mo.

- ✓ 3 hours consultation with CPA or tax attorney
- ✓ \$150 off Full Day Seminars
- ✓ Comprehensive Library including valuable white papers
- ✓ A hardback copy of the textbook *The Ultimate Guide to Tax Resolution*
- ✓ Full access to comprehensive Knowledge Base
- ✓ 20% discount on webinars and DVD's

Platinum annual: ~~\$1080.00~~ / **\$864.00**

Payroll Taxes

Payroll Taxes

- “Borrowing” from the Government
- Section 6672 of the tax code makes individuals personally liable
- The withheld amounts constitute a “fund” one holds in “Trust” for the government.

Components of Payroll Taxes

Comprised of:

- Trust fund portion (employee withholdings including taxes, Social Security and Medicare)
- Non trust fund portion
- Interest (compounded daily)
- Penalties

Payroll taxes are not Dischargeable in Bankruptcy

Trust Fund portion is assessed personally to Responsible Person/s

A person will be held personally liable for the withheld taxes if...

- They are responsible for its collection and payment
- Their failure to collect the tax and pay it over is “willful”

Solving Payroll Tax Issues

4 most common methods:

- Installment agreement
- Partial-pay installment agreement (PPIA)
- In-business offer in compromise (“OIC”)
- Hybrid Bulk-Sale and OIC

Low Hanging Fruit #2

Represent your client in a Trust Fund
Recovery Penalty 4180 interview

Earn \$4,000 - \$6,000 each

4180 Interview

What is a 4180 Interview?

- This is the process the IRS uses to determine who is personally responsible for not making Federal payroll tax deposits.

4180 Interview

Again...your expertise should dictate the fees you charge, not the time you spend...

Acting timely in this instance can get your client “off the hook” personally

4180 Interview

Things to consider...

- Is your client an “owner” of the company?
- Is your client a signer on the bank account?
- Did your client sign paychecks?
- Was your client the decision maker with respect to non payment of payroll taxes?

4180 Interview

Preparation...

- Obtain a copy of form 4180 on our website
- Perform a mock interview – prepare your client
- Prepare a collection information statement (433B if a business entity) to create an installment agreement at the interview?
- Try and limit the number of responsible persons if are representing more than one person?
- Keep your client off the hook personally (at least for the short term...)

4180 Interview

Desired outcome...

- Limit the number of responsible persons
- Enter into an installment agreement for the company
- Keep the responsible persons “off the hook” at least for the time being

Polling Question 3

How often do you have clients with payroll tax issues?

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- We teach you how to become a tax resolution specialist
- We become your partner working side-by-side to help you resolve your client's IRS and State income, payroll (collection issues) and tax audit issues
- We become your trusted referral source

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Low Hanging Fruit #3

Status 63

keep your client off the hook personally

Earn \$1,000/hr

Status 63

We cannot stress this enough...your expertise should dictate the fees you charge, not the time you spend...

- Entering your client into Status 63 will save them in ways you cannot imagine

Status 63

What is IRS Status 63?

- If a business remains in good standing subsequent to entering into an installment agreement, the IRS may delay/forego assessing and collecting from responsible person/s.

Status 63

Things to consider...

- Is the business able to maintain installment agreement payments?
- Will the business stay current on tax filings?
- Can the business make estimated payments going forward?
- Are the responsible persons in compliance on a personal level?

Status 63

Benefits

- The entity/owners only need to make a single monthly payment
- The responsible person/s need not pay personally
- The responsible person/s credit is not affected

10 Minute Break

See what TRI has to offer

- Live full-day seminars
- Full-day webcasts
- Webinars
- eLearning courses
- Textbooks
- Subscriptions
- Books and DVDs
- Professionals System

10 Minute Break

Live Full-Day Seminars

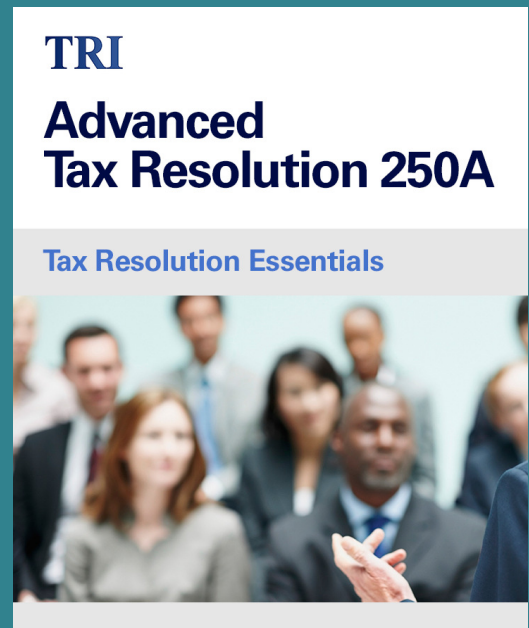
- More than 50% of the people that attend come again...and we buy lunch
- Voted #1 tax resolution seminar 2015 and 2016
- Learn from the leaders
- Featured guest speakers
- Interactive experience
- Network with other professionals
- and much more...

Live Seminars: \$349

10 Minute Break

Full-Day Webcasts

- View the webcast from your home or office
- Watch the seminar/webcast live
- If you cant make it live, this is the way to go
- Watch it at a later date if more convenient
- CPE/CE/MCLE offered for CPAs EAs and Lawyers
- It doesn't get better than this...

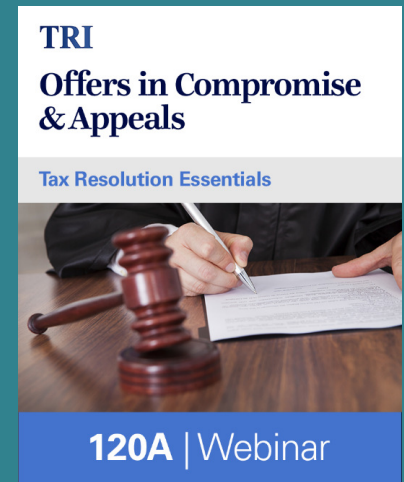


Webcasts: \$249

10 Minute Break

Webinars

- Introduction to Tax Resolution
- IRS Audits...Art or Science
- Low Hanging Fruit
- Advanced offers and compromise
- IRS Appeals – both audit and collection
- Cost segregation
- Alternative financing
- and much more...



Webinars: \$99

10 Minute Break

eLearning...learn at your pace

- You never saw eLearning like this...
- Offers in compromise
- Advanced offers in compromise
- Installment agreements
- Tax appeals
- IRS audits
- and much more...

TRI
Offers in Compromise

E-Learning Course



400A

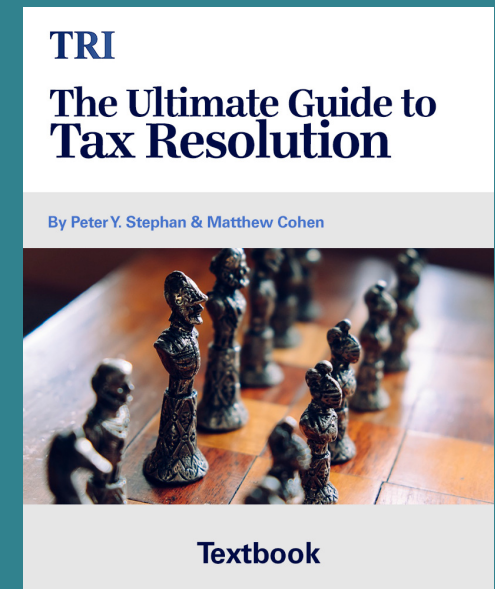
eLearning: \$79

10 Minute Break

Textbook

(a “must have” reference guide for anyone practicing tax resolution)

- The Ultimate Guide to Tax Resolution is the only reference guide you need
- Rewritten for ease of use
- Over 500 pages of valuable material
- Hardcover and digital versions
- Interactive materials
- and much more...



Hardcover: \$149
PDF: \$99

Subscriptions

Webinars, seminar & textbook included in the platinum annual subscription

- Platinum/Gold/Silver...your choice
- Includes consultation time
- Includes document review
- Receive discounts on everything
- If you one thing this year...this is it

10 Minute Break



Platinum Annual: \$1,080

(3 hours consultation time)

Ask about our gold and silver packages

10 Minute Break

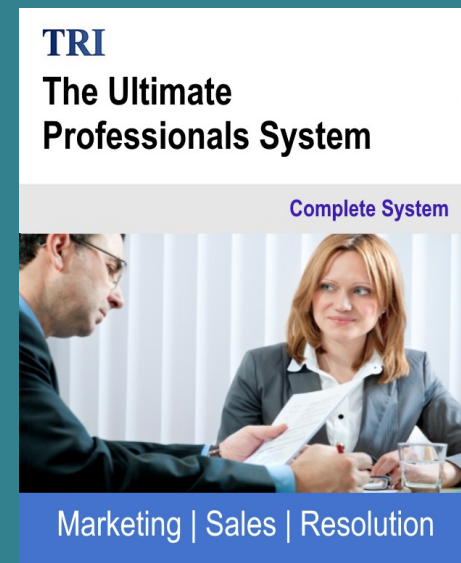
Books and DVD's

- Desktop tax resolution manual \$39
73 pages of quick reference
- Selling for professionals \$79
Don't botch the close
- Textbook \$149
A must have for intermediate and advanced practitioners
- 2-day course 5-DVD set \$219
The best of our most popular seminar

10 Minute Break

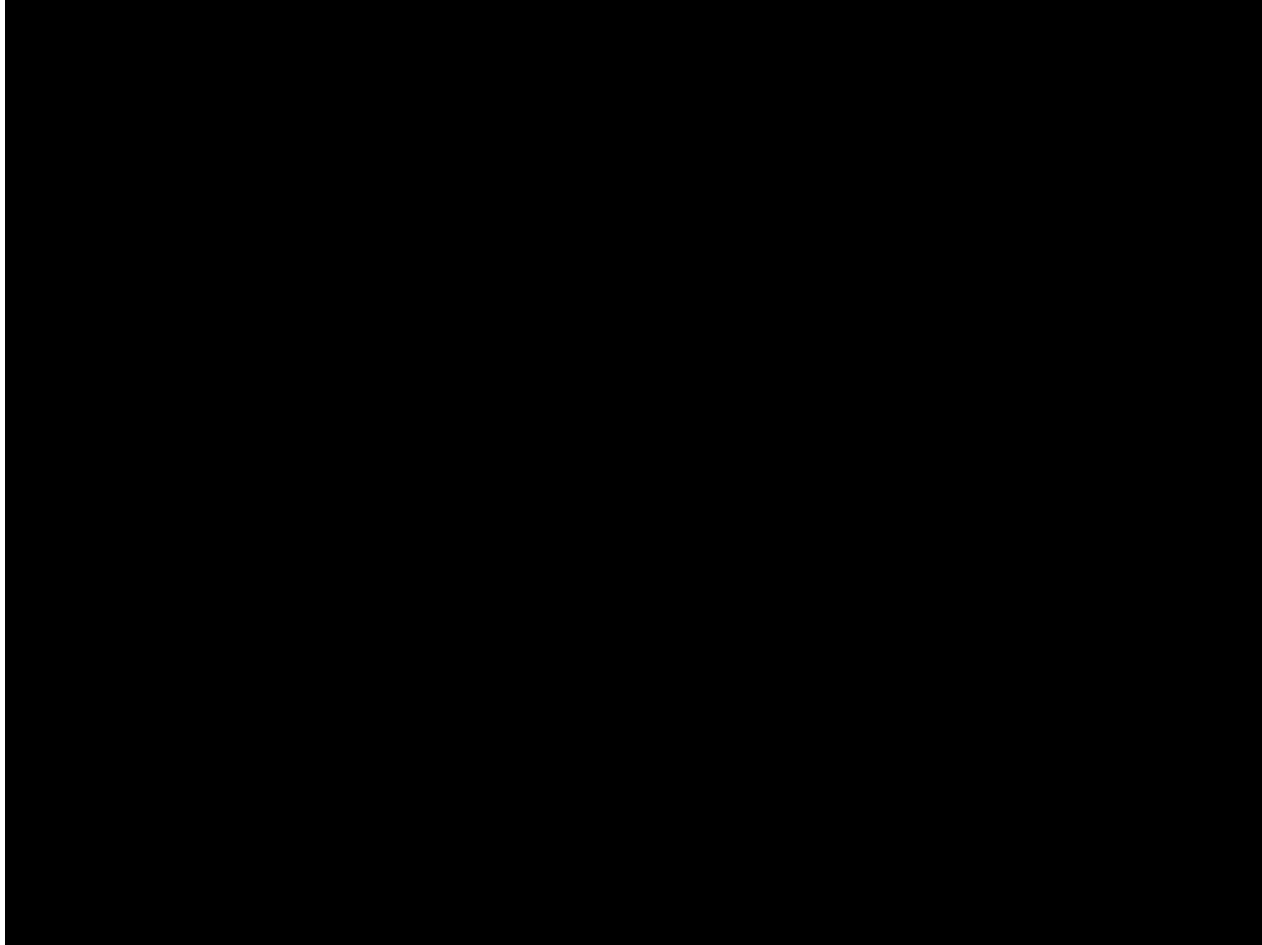
Professional's System

- Market, sell, practice...
- Make 10 times its cost, or we'll refund your money...no questions asked
- Online instruction and audio companions included
- Live support
- 3 months platinum subscription
- and much more...



Complete System: \$3,500

Crossing the River



Summary of what we offer...

- Live full-day seminars
- Full-day webcasts
- Webinars
- eLearning courses
- Textbooks
- Subscriptions
- Books and DVDs
- Professionals System

Low Hanging Fruit #4

Bulk Sale

Earn \$20,000 more

Bulk Sale

What is a bulk sale?

If you has outstanding tax liability, the owner/s may sell the company at liquidation value and eliminate the taxes providing full disclosure to the IRS...

Bulk Sale

Things to know

- You may sell the company to almost anyone including an employee, your cousin or even a sibling
- Income taxes, non-trust fund taxes, interest and penalties “die” with the dissolution of the prior company
- You must be careful to show there is no successor liability

Bulk Sale

“Cleaning up” after the sale

- The ex “owners” of the company can work as employees of the new company
- If the “owners” of the prior company have Civil Penalty stemming from payroll tax Trust Fund Penalties assessed to them personally, they can enter into an installment agreement or submit an offer in compromise
- Typically, any proceeds (remember, assets are being sold at liquidation value...not FMV) from the sale will go to the IRS

Taxes and Bankruptcy

Taxes and Bankruptcy

- Income taxes may be discharged in bankruptcy
- Certain rules (“conditions”) must be met to discharge taxes in bankruptcy
- Payroll Taxes may not be discharged in bankruptcy

Bankruptcy Tax Dischargeability Rules:

- **Three-Year Rule**

At least Three years from the due date of the tax return including extensions; or

- **Two-Year Rule**

At least Two years from the date the tax return was filed (we say assessed) for delinquent returns; and

- **240-Day Rule**

At least 240 days from the date of assessment of an audited or amended tax return

Examples of Tolling Events (effects statutes of limitation)

Statute of Limitation for collection by the IRS tolls (is frozen and therefore extended) under the following circumstances:

- 240 days; plus
- The number of days each offer in compromise for the applicable tax had been pending; plus
- 30 days for each applicable offer in compromise; plus
- The number of days each prior bankruptcy proceeding had been pending after the related tax return due date with valid extensions; plus
- Six months for each applicable bankruptcy proceeding
- The period of time taxpayer spends living outside the country

Low Hanging Fruit #5

Prepare a tax dischargeability analysis

Earn \$1,500 – 4,000

Tax Dischargeability Analysis

What is a Tax Dischargeability Analysis (TDA)?

- This is an analysis used to determine if and when income taxes may be dischargeable in bankruptcy based upon conditions including the 3-year rule, the 2-rule, the 240-day rule and tolling events.

Tax Dischargeability Analysis

Things to consider...

- Were the tax returns filed timely?
- Did the IRS prepare substitutes for returns (SFR's)?
- How much time has passed since the return/s were filed?
- Were the tax return/s amended?
- Was there a previous installment agreement?
- Was a CAP, CDP or other type of appeal filed?

Tax Dischargeability Analysis

More things to consider...

- Was an offer in compromise submitted?
- Was the taxpayer out of the country for an extended period of time?
- Did the taxpayer file a previous bankruptcy?
- Were the tax return/s amended?

Polling Question 4

Would you be interested in a free monthly practitioner's forum to have your tax resolution questions answered?

Learn everything... you need to know!

Tax Resolution in a box

Our complete Professional's System

- Market
- Sell
- Practice



Complete System: \$3,500.00

Low Hanging Fruit #6

5 sales tips
every service professional should know

Close more sales

Sales Tip 1

Speak with the decision-maker

Sales Tip 2

Prequalify your prospect

Sales Tip 3

Discover what motivated your prospect to contact you (it's not what you think)

Sales Tip 4

“Yes” or “No”...“Maybe” is not acceptable

Sales Tip 5

Don't be an unpaid consultant

Summary of Today's Low Hanging Fruit

- Streamlined installment agreement
- Represent your client in a Trust Fund Recovery Penalty 4180 interview
- Status 63 – keep the Trust Fund recovery penalty from hitting you client's credit
- Bulk Sale
- Tax Dischargeability Analysis
- 5 sales tips every service professional should know

“Sell knowledge not time...”

Our mission today...

- 1) Help you make money**
- 2) Teach you how to become a tax resolution specialist;**
- 3) Become your tax resolution partner; or**
- 4) Become your trusted referral source**

Find us on the web at: www.taxresolutioninstitute.org

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Call us at: (800) 747-8718

I'm Peter Stephan....

...and this is **TRI**

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...every Tuesday 10:00 am pst

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